

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

ISRAEL GARCIA, JR.,  
Plaintiff,

v.

ENHANCED RECOVERY COMPANY,  
LLC,  
Defendant.

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Civil Action No. 3:16-CV-0435-D

**AGREED MOTION FOR ENTRY OF PROTECTIVE ORDER**

TO THE HONORABLE COURT:

COMES NOW Defendant, Enhanced Recovery Company, LLC (“Enhanced”), and files this Agreed Motion for Entry of Agreed Protective Order. As evidenced by the signatures on the Agreed Protective Order submitted herewith, the parties are in agreement that the Agreed Protective Order submitted herewith should be entered by the Court. This Order will govern the use of confidential documents and information in this matter.

WHEREFORE, Defendant prays that this Court enter the Agreed Protective Order filed herewith.

Respectfully submitted,

By: */s/ Brian A. Kilpatrick*

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ATTORNEYS FOR DEFENDANT  
ENHANCED RECOVERY COMPANY,  
LLC

**CERTIFICATE OF SERVICE**

I hereby certify that on the 8th day of June, 2016, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system,. I further certify that a true and correct copy of the foregoing instrument is also being mailed to the plaintiff at the following address:

Israel Garcia, Jr.  
115 Evening Star Circle  
Red Oak, Texas 75154

*/s/ Brian A. Kilpatrick*

Brian A. Kilpatrick